

**PETER S. CHRISTIANSEN, ESQ.**

Nevada Bar No. 5254

[pete@christiansenlaw.com](mailto:pete@christiansenlaw.com)

# R. TODD TERRY, ESQ.

Nevada Bar No. 6519

tterry@christiansenlaw.com

## KEELY P. CHIPPOL

Nevada Bar No. 13931

keely@christiansenlaw.com

## CHRISTIANSEN TRIAL II

710 South 7<sup>th</sup> Street, Suite

Las Vegas, Nevada 89101

Telephone: (702) 240-7979

Facsimile: (866) 412-6992

*Attorneys for Plaintiff*

• • •

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

SEBASTIAN SYMEONIDES, an Individual;

Plaintiff,

VS.

TRUMP RUFFIN COMMERCIAL, LLC, a Foreign Limited-Liability Company d/b/a TRUMP INTERNATIONAL LAS VEGAS and TRUMP INTERNATIONAL HOTEL & TOWER LAS VEGAS; TRUMP RUFFIN TOWER I, LLC, a Foreign Limited-Liability Company; TRUMP INTERNATIONAL HOTELS MANAGEMENT, LLC, a Foreign Limited-Liability Company; OTIS ELEVATOR CORPORATION, a Foreign Corporation; DOES I through X, inclusive; and ROE BUSINESS ENTITIES I through XX inclusive,

## Defendants.

CASE NO. 2:23-cv-00854-JAD-MDC

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
PLAINTIFF'S REPLY BRIEFS  
REGARDING PLAINTIFF'S  
MOTION FOR SANCTIONS DUE TO  
DEFENDANTS' SPOILATION OF  
EVIDENCE [ECF Nos. 90 and 92]**

**IT IS HEREBY STIPULATED AND AGREED**, by all parties, by and through their respective counsel of record, that the deadline for Plaintiff to file reply briefs to Defendant Trump Ruffin Tower I, LLC's Opposition to Plaintiff's Motion for Sanctions Due to Defendants' Spoliation of Evidence [ECF No. 109] and Defendant Otis Elevator Company's Points and Authorities in Response to Plaintiff's Motion for Sanctions Due to Spoliation of Evidence [ECF No. 110], currently due May 29, 2025, shall be extended to June 5, 2025.

1       The parties respectfully request a one-week extension of the deadline for Plaintiff to file  
 2 reply briefs to Defendants' oppositions to his Motion for Sanctions Due to Defendants' Spoliation  
 3 of Evidence. Good cause exists for this request because the oppositions involve complex legal  
 4 and factual issues, and additional time is needed to fully and completely respond to each issue.  
 5 Properly responding to both oppositions requires a thorough review of extensive records, expert  
 6 reports, deposition testimony, and case law to ensure the Court receives well-reasoned and  
 7 comprehensive arguments. Extending the deadline will ensure adequate time for Plaintiff to  
 8 research the relevant legal issues and fully respond to the arguments raised in Defendants'  
 9 opposition briefs, ensuring that the Court has the full context to make an informed decision.

10      Notably, the parties previously agreed to a two-week extension for Defendants to file their  
 11 oppositions, which the Court approved. ECF No. 108. Plaintiff makes this request in good faith  
 12 and not for purposes of delay, and believes that a brief extension will aid the Court by allowing  
 13 Plaintiff to prepare thorough and focused reply briefs. No party will be prejudiced by the  
 14 requested extension.

15      Dated this 28<sup>th</sup> day of May, 2025

16  
 17      Respectfully Submitted By:  
 18      CHRISTIANSEN TRIAL LAWYERS

19      /s/ *Keely P. Chippoletti*

20      

---

  
 21      PETER S. CHRISTIANSEN, ESQ.  
 22      Nevada Bar No. 5254  
 23      R. TODD TERRY, ESQ.  
 24      Nevada Bar No. 6519  
 25      KEELY P. CHIPPOLETTI, ESQ.  
 26      Nevada Bar No. 13931  
 27      710 South 7th Street  
 28      Las Vegas, NV 89101  
*Attorneys for Plaintiff*

Approved as to Form and Content:  
 ROGERS, MASTRANGELO, CARALHO &  
 MITCHELL

/s/ *Su-Lyn Combs*

---

REBECCA L. MASTRANGELO, ESQ.  
 Nevada Bar No. 5417  
 700 South 3rd Street  
 Las Vegas, NV 89101

VASUDHSIRI T. SATHIENMARS, ESQ.  
 SU-LYN COMBS, ESQ.  
 TUCKER ELLIS LLP  
 515 South Flower Street, 42<sup>nd</sup> Floor  
 Los Angeles, CA 90071

*Attorneys for Defendant Otis Elevator Co.*



1 Approved as to Form and Content:

2 LEWIS BRISBOIS BISGAARD & SMITH  
3 LLP

4 /s/ *Yilmaz E. Turkerti*

5 DAVID B. AVAKIAN, ESQ.  
6 Nevada Bar No. 9502  
7 YILMAZ E. TURKERI, ESQ.  
8 Nevada Bar No. 15468  
9 6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
*10 Attorneys for Defendant Trump Ruffin Tower*  
*I, LLC, erroneously sued herein as Trump*  
*Ruffin Commercial, LLC, d/b/a Trump*  
*International Vegas and Trump International*  
*Hotel & Tower Las Vegas; and Trump*  
*International Hotels Management, LLC*

13  
14 **ORDER**

15 IT IS SO ORDERED that the deadline for Plaintiff to file reply briefs to Defendant Trump  
16 Ruffin Tower I, LLC's Opposition to Plaintiff's Motion for Sanctions Due to Defendants'  
17 Spoliation of Evidence [ECF No. 109] and Defendant Otis Elevator Company's Points and  
18 Authorities in Response to Plaintiff's Motion for Sanctions Due to Spoliation of Evidence [ECF  
19 No. 110], currently due May 29, 2025, is hereby extended to June 5, 2025..

20  
21  
22 United States Magistrate Judge  
23  
24  
25 Dated: 5-30-25  
26  
27  
28

